

HALPRIN, TEMPLE & GOODMAN

1100 NEW YORK AVENUE, N.W., SUITE 650 EAST
WASHINGTON, D.C. 20005

(202) 371-9100 TELEFAX: (202) 371-1497

ORIGINAL

ALBERT HALPRIN
RILEY K. TEMPLE
STEPHEN L. GOODMANMELANIE HARATUNIAN
JOEL BERNSTEIN
JANICE OBUCHOWSKI, OF COUNSEL

April 1, 1994

RECEIVED
APR - 1 1994
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYMr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554Re: CC Docket No. 94-18 Establishment of an Advisory
Committee

Dear Mr. Caton:

The Commission recently issued a Public Notice seeking comment on the establishment of an Advisory Committee to assist the Common Carrier Bureau in developing an electronic filing system.^{1/} Northern Telecom Inc. ("Northern Telecom"), through its counsel, offers its strong support for such a Committee. Northern Telecom manufactures, sells and services telecommunications equipment to many segments of the common carrier industry, including equipment for wired and wireless networks. Northern Telecom also produces electronic document delivery systems, which are at the heart of this proposed proceeding. Northern Telecom currently has telecommunications products in-service in each of the fifty (50) states.

Northern Telecom believes that its customers' interests and the public interest generally would be furthered by Commission action to speed the application processing function. Electronic filing holds such promise. The information would be available to the Bureau and the public sooner, and the information would be available in a more usable format. Thus, the Bureau could conduct its review more efficiently and accurately, and other potentially affected parties could analyze the applications more readily. As a result, coordinations could be accomplished quickly, and the Bureau in turn could license new services and systems faster.

^{1/}Public Notice, FCC 94-44, released March 7, 1994.No. of Copies rec'd
List A B C D E

Mr. William F. Caton
Acting Secretary, FCC
April 1, 1994
Page 2

This enhanced ability to utilize the information resulting from electronic filing of applications will allow the advanced telecommunications infrastructure to be deployed more rapidly. The faster licensing made possible by electronic filing will thereby expand the economy and lead to the creation of new jobs. In addition, electronic filing will generally make information available to the public in an easy and efficient manner, which is consistent with the Commission's goal of "reinventing government."

Northern Telecom also believes that the Bureau's development of electronic filing procedures could readily be extended to other Commission functions, such as applications for type approval of equipment. In this manner, the Commission's processes in general would become more efficient, which would redound to the benefit of Northern Telecom and the rest of the public.

Northern Telecom believes that an Advisory Committee will assist the Bureau in developing and implementing an electronic filing system. Northern Telecom, along with others, has developed an expertise in the hardware and software necessary for electronic document transfer. An Advisory Committee will allow the Bureau to "tap into" that expertise, and thus minimize any delays in developing the necessary systems. In addition, an Advisory Committee can provide the Bureau with insights on making the information most "user friendly" for the different segments of the public.

For all of these reasons, Northern Telecom urges the Commission to establish an Advisory Committee to help with the development and deployment of an electronic filing system for the Common Carrier Bureau. Northern Telecom is willing to serve on that Committee, or to provide whatever assistance it can to help with this laudable project.

Respectfully submitted,



Stephen L. Goodman
Counsel for Northern Telecom Inc.

cc: Jim Talens
Rosalee Chiara
Kristi Kendall